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June 9, 2000

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**VIA HAND DELIVERY**

David Waddell  
Executive Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: Application of BroadStreet Communications, Inc. for a Certificate of Convenience and Necessity to Provide Facilities-Based and Resold Local Exchange and Intrastate Interexchange Telecommunications Services Within Tennessee  
Docket No. 00-00249

Dear Mr. Waddell:

This submittal contains the BroadStreet Communications, Inc. ("BroadStreet") responses to a pending Information Request by the Tennessee Regulatory Authority. The response to the Information Request of May 12, 2000 is given below and is structured in same outline format used in the data request to address each question individually.

**Numbering Issues**

1. **What is your company's expected demand for NXXs per NPA within a year of approval of your application?**

BroadStreet estimates it will require 11 blocks of NXX's within a year of approval of its application.

2. **How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?**

BroadStreet estimates that 28 blocks of NXX's will be requested.

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**3. When and in what NPA do you expect to establish your service footprint?**

BroadStreet currently expects to establish its service footprint in Tennessee in the following NPAs: Knoxville (865); Chattanooga (423); and Tri-Cities (423).

**4. Will the company sequentially assign telephone numbers within NXXs?**

As a general rule, BroadStreet will sequentially assign telephone numbers with NXXs; however in instances when a customer initiates the selection of non-sequential numbers, BroadStreet will evaluate the request on a case-by-case basis. If BroadStreet accepts the request, it will assign the non-sequential numbers from its existing inventory.

**5. What measures does the company intend to take to conserve Tennessee numbering resources?**

BroadStreet intends to take the following steps to conserve Tennessee numbering resources:

a. Local Number Portability (LNP). BroadStreet currently projects that a significant percent of its new customer base will be obtained through the conversion of customers with existing telephone service from other carriers. The effect of LNP will be appreciable in this context. BroadStreet estimates that the majority of these customers will elect to retain their existing phone numbers, thereby reducing the net amount of new telephone numbers that need to be released to serve the same population of customers.

b. Advanced Inventory Management Systems. Pursuant to BroadStreet's internal numbering policy, BroadStreet will return telephone numbers to the internal modern inventory management system after actual customer disconnections and 60 days of playing the number change announcement. These numbers will then be immediately available for reuse.

c. Number Pooling. BroadStreet will support Number Pooling where available. BroadStreet will initially check with the internal inventory management system before using new numbering resources. In addition, BroadStreet will return those blocks of NXXs that are not used by BroadStreet within a reasonable period of time.

6. **When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX be initiated?**

When ordering new NXXs for growth, BroadStreet intends to use 70% fill of an existing NXX to determine when a request for new NXXs will be initiated. The BroadStreet algorithm used to calculate the percentage-fill trigger for ordering new NXXs is a function of current BroadStreet consumption rates, future market projections for that region and estimated timeframes for obtaining new NXXs. BroadStreet strives to implement one of the most efficient operational systems in the industry and will continually optimize the ordering of new NXXs as the variable rates change to preserve Tennessee numbering resources.

#### **Tennessee Specific Operational Issues**

1. **How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee?**

BroadStreet will follow industry standard guidelines in complying with the toll-free countywide calling requirement in TCA §65-21-114. BroadStreet will build its database and program its switches in such a way that county identification information can be determined, and that in Tennessee, countywide calls will not be assessed a toll charge.

2. **Is the company aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter your telephone numbers on the database?**

BroadStreet is generally aware of the Tennessee County Wide Calling database and as part of the interconnection implementation process, BroadStreet will coordinate with BellSouth to identify and follow applicable procedures for entry of BroadStreet's telephone numbers in BellSouth's Tennessee County Wide Calling Database. To ensure ongoing compliance with Tennessee's toll-free calling requirements, BroadStreet will continually update and modify its databases in a reasonable timeframe after availability.

3. **How does your company intend to provide metro area toll-free calling ("MAC") around Memphis, Nashville, Knoxville and Chattanooga?**

To increase customer choice, BroadStreet intends to offer an optional service allowing customers to expand their local calling area to include other rate centers in the calling scope with unlimited toll-free calling. BroadStreet plans on offering

this service to reflect the toll-free local calling scopes of the incumbent LEC serving in the same market area. All basic and expanded local toll free calls will be measured by length of call, time of day call is placed, and distance called. This data will be collected and compiled and then processed by the internal billing systems to determine the billable calls.

- 4. Is the company aware of the MAC database maintained by BellSouth and the process and procedures to enter your telephone numbers on the database?**

BroadStreet is generally aware of the MAC database maintained by BellSouth and the process and procedures to enter the BroadStreet telephone numbers into the database. As part of the interconnection implementation process, BroadStreet will coordinate with BellSouth to identify and follow applicable procedures for entry of BroadStreet's telephone numbers in to the MAC database. BroadStreet will comply with Tennessee's toll-free requirements by continually processing updates and modify its database in a reasonable amount of timeframe after availability.

- 5. Please provide the name and telephone number of an employee of your company that will be responsible to work with the TRA on resolving customer complaints.**

The individual in charge of responding to customer complaints will be a designated Customer Care Manager. The company's toll-free number for customer complaints is 1-877-638-2861.

- 6. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA § 65-4-401 *et seq.* and Chapter 1220-4-11?**

The company may telemarket its services, and is aware of the cited statutes and regulations.

**Financial Requirements:**

**TCA § 65-4-125 amendment states that by September 1, 2000, all telecommunications service providers subject to the control and jurisdiction of the authority, except those owners or operators of public telephone service who pay annual inspection and supervision fees pursuant to TCA § 65-4-301(b) or any telecommunications service provider that owns and operates equipment facilities in Tennessee with a value of more than five million**

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**(\$5,000,000), shall file with the authority a corporate surety bond or irrevocable letter of credit in the amount of twenty thousand dollars (\$20,000) to secure the payment of any monetary sanction imposed in any enforcement proceeding, brought under this title or the Consumer Telemarketing Protection Act of 1990, by or on behalf of the authority.**

The company will comply with TCA § 65-4-125, as amended, by filing the required surety bond by the required deadline, if required by § 65-4-125 to do so.

We believe these responses adequately address the Authority's questions posed in the Information Request. Please feel free to contact me if you have any questions.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC



By:  
April A. Ingram

AAI/nl

cc: Phil Fraga, Esq.  
Doug Bonner, Esq.